

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
	:	

**TRIAL EXHIBIT LIST OF DEFENDANT UNIVERSAL PROTECTION SERVICE, LP d/b/a ALLIED UNIVERSAL SECURITY SERVICES**

No.	DESCRIPTION	OFFER	OBJ	DATE	
				ADMIT	N/ADM
1.	Incident Reporting and Response				
	<i>[AUS 00983; AUS 00824]</i>				
2.	Inspection Report by Chameleon Associates				
	<i>[AUS 00731 - AUS 00732]</i>				
3.	Poster - Avoid Using Force				
	<i>[AUS 00958]</i>				
4.	TMO Pocket Training Guide HEB				
	<i>[AUS 00956]</i>				
5.	HEB Elite Team Mandatory Training				
	<i>[AUS 00921]</i>				
6.	Firearms, Less Lethal Weapons, Defensive Tactics and Equipment Policy; Use of Force				

	Policy Acknowledgement Form  [AUS 00938 - AUS 00989]				
7.	Firearms, Less Lethal Weapons, Defensive Tactics and Equipment Policy; Armed Officer Certification and Acknowledgment Form  [AUS 00922 - 00927]				
8.	Disciplinary Matrix Guidelines  [AUS 00743 - AUS 00746]				
9.	Legal - Use of Force and Reporting Policy  [AUS 00734 - AUS 00742]				
10.	2023 Ahmed's Form 1099  [AhmedAllied 000658]				
11.	2022 Ahmed's Form 1099  [AhmedAllied 000492]				
12.	2021 Ahmed's W-2 AUS  [AhmedAllied 000656]				
13.	Ahmed's Earnings Statement with Western Eagle Security (Amerom, Inc.)  [AhmedAllied 000646 - AhmedAllied 000653]				
14.	2022 Ahmed W-2 Amerom, Inc.  [AhmedAllied 000654]				
15.	2021 Ahmed W-2 Amerom, Inc.  [AhmedAllied 000655]				

16.	2022 Ahmed's W-2 AUS  <i>[AhmedAllied 000627]</i>				
17.	Ahmed's Earning Statement with AUS  <i>[AUS 00682 - AUS 00695]</i>				
18.	Ahmed NEO Certificate  <i>[AUS 00663]</i>				
19.	Ahmed Training Certification - Preventing Unlawful Discrimination & Harassment  <i>[AUS 00664]</i>				
20.	Ahmed Security Professional ID Badge Receipt and Acknowledgment  <i>[AUS 00665]</i>				
21.	PATH Basis Course Certification Forms - Multiple Employees  <i>[AUS 00653- AUS 00654]</i>				
22.	Ahmed Weapon Issue/Return Form  <i>[AUS 00448- AUS 00449]</i>				
23.	Ahmed HEB Store Officer Training Checklist Form  <i>[AUS 00644 – AUS 00652]</i>				
24.	738 Bellaire Market Post Orders  <i>[AUS 00643]</i>				
25.	AUS Elite Officer PowerPoint  <i>[AUS 00940 – AUS 00955]</i>				
26.	AUS HEB Support Structure PowerPoint				

	[AUS 00910 – AUS 00920]				
27.	Proof of Completion of Use of Force Wallet Card  [AUS 01002; AUS 00829]				
28.	AUS Hot Sheet - All HEB Sites - General Post Orders  [AUS 00638 – AUS 00642]				
29.	AUS Hot Sheet - AUS Security Officer Post Orders  [AUS 01036 – AUS 01042]				
30.	PAN Form - Freeney Separation  [AUS 001906 - AUS 001909]				
31.	PAN Form - Ahmed Termination  [AUS 00700 – AUS 00703]				
32.	Email communication between Freeney and Hernandez regarding PAN for Ahmed on 4/14/2022  [AUS 01078 – AUS 001082]				
33.	TDPS Criminal History Search – Ahmed  [AUS 00635 – AUS 00637]				
34.	AUS Incident Report 4/4/2022 (written by Ahmed)  [AUS 00671]				
35.	Employee Statement 4/4/2022 (written by Ahmed)  [AUS 00674]				

36.	TDPS Employee Information Update Form (Ahmed)  [AUS 01546]				
37.	DHS Employment Eligibility Verification Form (Ahmed)  [AUS 01558 – AUS 01561]				
38.	Permanent Resident Card (Ahmed)  [AUS 01562 – AUS 01563]				
39.	EEOC Charge of Discrimination (Ahmed)  [AUS 00001- AUS 00002]				
40.	E-mails dated 6/3/2022 re: case information and paperwork for 36149, 36184  [AUS 01252 – AUS 01253]				
41.	AUS Job Description - Elite Security Professional - Armed  [AUS 00629 – AUS 00631]				
42.	AUS Job Description - General Manager  [AUS 001805 – AUS 001808]				
43.	AUS Job Description - Branch Manager  [AUS 001809 – AUS 001812]				
44.	AUS Job Description - Field Supervisor  [AUS 001817 – AUS 001820]				
45.	AUS Job Description - Regional Human Resources Manager  [AUS 001821 – AUS 001824]				
	AUS Job Description - Regional Human				

46	Resources Representative  [AUS 001825 – AUS 001828]				
47.	AUS Job Description - Human Resources Coordinator  [AUS 001829 – AUS 001832]				
48.	AUS Job Description - Client Manager  [AUS 001813 – AUS 001816]				
49.	AUS Job Description - Candidate Experience Specialist  [AUS 001833 – AUS 001835]				
50.	AUS job Description - Regional Trainer  [AUS 001836 – AUS 001838]				
51.	Root Cause Analysis - Version 1  [AUS 00807 – AUS 00808]				
52.	Root Cause Analysis - Version 2  [AUS 01200 – AUS 01201]				
53.	Use of Force and Reporting Policy; Use of Force Report Form (Handwritten)  [AUS 00672 – AUS 00673]				
54.	Use of Force and Reporting Policy; Use of Force Report Form (Typed - Version 1)  [AUS 00968 – AUS 00971]				
55.	Use of Force and Reporting Policy; Use of Force Report Form (Typed - Version 2)  [AUS 00998 – AUS 01001]				
	Hotline Complaint - Case No. 36184				

56.	[AUS 00008 – AUS 00013]				
57.	AUS Unacceptable Behavior Hot Sheet  [AUS 00704 – AUS 00705]				
58.	HEB Store Officer Training Checklist (Blank) - Version 1 (10 pages)  [AUS 01023 – AUS 01032]				
59.	HEB Store Officer Training Checklist (Blank) - Version 2 (9 pages)  [AUS 00747 – AUS 00755]				
60.	Incident Reporting and Response - Tab 07  [AUS 00713 – AUS 00730]				
61.	City of Bellaire CFS - Command Log  [AhmedAllied000526 - AhmedAllied000536; AhmedAllied000539 - AhmedAllied000540]				
62.	Text Messages Between MIC Kevin and Ahmed  [AhmedAllied000594 - AhmedAllied000597]				
63.	Court Records of Roberto E. Hernandez  [AhmedAllied000551 - AhmedAllied000555]				
64.	Photographs of Ahmed  [AhmedAllied000590, AhmedAllied001804]				
65.	Disciplinary Notice - 2/15/2022  [AUS 00596; AUS 00668]				
66.	Disciplinary Notice - 4/5/2022				

	[AUS 00669; AUS 00670; AUS 01055]				
67.	AUS Employee Handbook - All U.S. Locations  [AhmedAllied000010, AhmedAllied000198]				
68.	AUS New Employee Orientation  [AUS 001615 - AUS 001802]				
69.	AUS Human Resources Org Charts as of 10/2021  [AUS 001839 - AUS 001882]				
70.	AUS Diversity, Equity, and Inclusion Policy  [AhmedAllied000255 -AhmedAllied000259]				
71.	AUS North America Code of Ethics  [AhmedAllied000230 - AhmedAllied000254]				
72.	Ahmed's Job Applications for 2024  [AhmedAllied000485 - AhmedAllied000487; AhmedAllied000620 - AhmedAllied000644]				
73.	Ahmed's Letter to EEOC Investigator  [AUS 00495 - AUS 00497]				
74.	Ahmed's Counsel's communications with the EEOC Investigator  [AUS 00509 - AUS 00510; AUS 00480 - AUS 00484]				
75.	Ahmed's Electronically Signed Onboarding Documents  [AUS 00554 - AUS 00595]				
76.	Ahmed's Interview Schedule with AUS				

	<i>[AhmedAllied000481 - AhmedAllied000482]</i>				
77.	Ahmed's Contingent Job Offer with AUS  <i>[AhmedAllied000477 - AhmedAllied000478]</i>				
78.	Ahmed's Job Application with AUS  <i>[AhmedAllied000479 - AhmedAllied000480]</i>				
79.	Email communication between Ahmed and Alyea in May 25/26, 2022  <i>[AUS 01267]</i>				
80.	Internal Email Communication regarding Rehire Eligibility Status  <i>[AUS 01009]</i>				
81.	Email Communication between Felicia Solis-Ramirez and Bill King regarding SP's violation of UOF Policy  <i>[AUS 00972]</i>				
82.	Email communication between Alexzander Bergeron and Wayne Oliver regarding Ahmed's termination  <i>[AUS 01065]</i>				
83.	Email communication between Patrick Freeney and Wayne Oliver on June 10, 2022 regarding Ahmed  <i>[AUS 01165 - AUS 01166]</i>				
84.	Email Communications Regarding Ahmed's Rehire Application to AUS  <i>[AUS 01220; AUS 01269 - AUS 01270]</i>				
85.	Photos of Patrick Freeney  <i>[to be produced]</i>				

86.	Ahmed's Unemployment Application  [AUS 01272; AUS 01526]				
87.	Ahmed's Statement to Wayne Oliver on June 8, 2022  [AUS 01332 - AUS 01334]				
88.	Email Communications between Ahmed and Catherine Barnes in April 2022  [AhmedAllied000435 - AhmedAllied000436]				
89.	Internal Emails regarding Ahmed's violation of Use of Force Policy  [AUS 01402 - AUS 01403; AUS 00825 - AUS 00826; AUS 00842 - AUS 00844; AUS 00959 - AUS 00962]				

Date: May 2, 2025

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2025, I caused to be filed a true and correct copy of the foregoing document using the Court's CM/ECF system that will serve notice and a copy on all counsel of record as follows:

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